

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	CASE NO. 3:23-cr-00249-K
	§	
MRUNAL DESAI	§	

UNOPPOSED MOTION TO TRAVEL AND RELOCATE

I. *Preamble:*

COMES NOW, the Movant, MRUNAL DESAI, (hereinafter, the “Movant”), by and through his attorney of record, MICHELLE LUGO, (hereinafter, the “Attorney”), and files this Motion to Travel, (hereinafter, the “Motion”), praying this Honorable Court grant this Motion requesting the Movant be granted permission to extend, and to generally permit, travel to Atlanta based on the extensive needs of the Movant’s Father In Law and family in general. It may become necessary for the Movant to move to Atlanta. Additionally, the Movant is working and needs to travel within the Continental United States of America.

II. *Facts:*

The Movant’s Father in Law has just been moved into a long term rehabilitation center following surgery. The Movant and his family are considering moving to Atlanta in order to meet the needs of the Movant’s in-laws. The Movant will need to travel for business as well, whether or not he relocates to Atlanta.

III. *Prayer for Relief:*

Based on the foregoing, the Movant hereby respectfully requests this Court grant the Movant permission to travel and reside within the Continental United States of America, provided he communicates his whereabouts and intended whereabouts to his Pretrial Officer as soon as practicable.

Respectfully submitted,

/s/ Michelle Lugo

Michelle Lugo
Attorney on behalf of
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CERTIFICATE OF CONFERENCE

I hereby certify I conferred with the Attorney for the United States of America in the above-styled Cause, and he has stated the Government is unopposed to this Motion.

/s/ Michelle Lugo

CERTIFICATE OF SERVICE

I, Michelle Lugo, hereby certify that on the 9th day of August, 2023, I electronically filed the foregoing document with the United States District Clerk for the United States District Court for the Northern District of Texas, through the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the following parties who have consented to accept this Notice as service of this document by electronic means: Assistant U.S. Attorney, Fabio Leonardi, Counsel for the United States of America.

/s/ Michelle Lugo

Michelle Lugo
On behalf of The Lugo Law Firm, PLLC
Attorney for the Movant, Mrunal Desai